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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,) No. CR 11-00422-02 LHK
Plaintiff,)
v.)
GURINDER KIREN MAND)
Defendant.)
)

STIPULATION AND [PROPOSED]
DISCOVERY PROTECTIVE ORDER
BETWEEN THE UNITED STATES AND
DEFENDANT

Defendant Gurinder Kiren Mand and the United States of America, by and through their counsel of record, hereby agree and stipulate as follows:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory powers.

2. This Order pertains to all discovery provided to or made available to defense counsel as part of discovery in the above-cited case.

3. The discovery and information therein may only be used in connection with the litigation of this case and for no other purpose. Defense counsel will return the discovery to the government, or certify that has been shredded at the conclusion of the case.

4. Defense counsel shall not provide any of the discovery to any person other than

1 to his respective defendant/client, or attorneys, law clerks, paralegals, secretaries, experts and
2 investigators involved in the representation of his defendant/client, for the purpose of said
3 representation. Further, in disclosing discovery to defendant, personal information contained in
4 the discovery, including individuals' dates of birth, addresses (physical and email), telephone
5 numbers, social security numbers, and driver's license numbers, shall be redacted, and shall not
6 be provided to any defendant in any manner or form.

7 5. Defense counsel shall advise his respective defendant/client, employees,
8 other authorized members of the defense team and defense witnesses of the terms of this
9 stipulation and order, and that use of the subject discovery materials for a purpose other than in
10 connection with the litigation of this case may be subject to criminal sanctions.

11 6. Defense counsel will store the discovery in a secure place and will exercise due
12 diligence to ensure that it is not disclosed to third persons in violation of this agreement.
13 Similarly, if defense counsel makes or causes to be made, copies of any of the discovery, defense
14 counsel will exercise due diligence to maintain control of said copies and to ensure that said
15 copies are stored in a manner to safeguard against the inappropriate use of said materials.

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17 DATED: July 13 , 2011

MELINDA HAAG
United States Attorney

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19 _____/s/
20 EUMI L. CHOI
Assistant United States Attorney

21 _____/s/
22 RONI ROTHOLZ, ESQ.
Attorney for Gurinder Kiren Mand
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ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court
HEREBY ORDERS that the terms of the stipulation between the United States and all
defendants in this case pertaining to the discovery in this case be imposed.

IT IS SO ORDERED.

DATED: 7/14/2011

Paul S. Grewal
PAUL S. GREWAL
UNITED STATES MAGISTRATE JUDGE